

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
) No. MDL 1:13-md-02419
This Document Relates To:)
)

**MOTION FOR ADMISSION *PRO HAC VICE*
OF ATTORNEY STEPHEN W. ELLIOTT**

Pursuant to Local Rule 83.5.3, the undersigned moves this Honorable Court to admit Stephen W. Elliott, a member of the Tennessee bar, as attorney of record of Michael O'Neal in the above-captioned matter. O'Neal was served with a subpoena duces tecum by the Plaintiffs' Steering Committee. In support of this motion, the undersigned attorney states as follows:

1. Stephen W. Elliott is a member in good standing of every jurisdiction where he has been admitted to practice.
2. There are no disciplinary proceedings pending against Stephen W. Elliott in any jurisdiction.
3. Stephen W. Elliott has never been denied admission *pro hac vice* or had an admission *pro hac vice* revoked by any court in any jurisdiction.
4. Stephen W. Elliott has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.
5. Stephen W. Elliott is admitted to practice in all state courts in Tennessee, in the United States District Courts for the Western, Middle, and Eastern Districts of Tennessee, and the Sixth Circuit Court of Appeals.

6. Tennessee grants similar *pro hac vice* privileges to Massachusetts attorneys pursuant to Tennessee Supreme Court Rule 19.

7. If admitted in the above-captioned matter, Stephen W. Elliott will represent Michael O'Neal, with whom he has an existing attorney-client relationship.

8. Michael O'Neal will be severely prejudiced in this matter if Stephen W. Elliott is not permitted to represent him in this action.

9. This motion is supported by the Certificate of Good Standing for Stephen W. Elliott duly issued by the Tennessee Supreme Court (Exhibit A) and the affidavit of Stephen W. Elliott (Exhibit B).

WHEREFORE, the undersigned moves this Honorable Court to admit Stephen W. Elliott *pro hac vice* as counsel of record for Michael O'Neal in this case, and to instruct Mr. Elliott to file his appearance on behalf of O'Neal in this case within thirty days of the Court's granting of this motion.

Dated: November 5, 2015

Respectfully submitted,

/s/ Kathryn Young
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CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically through the CM/ECF system on November 5th, 2015, and served electronically on all counsel of record.

/s/ Kathryn M.A. Young

Kathryn Young